

Nathan Mitchler

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April 28, 2006

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

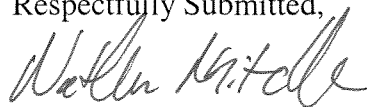
Re: *Ex Parte* Notice in IB Docket No. 02-364.

Dear Ms. Dortch:

On April 27, 2006, William F. Adler, Vice President-Legal & Regulatory Affairs, Globalstar, David Weinreich, Spectrum Manager, Globalstar, and William T. Lake, Counsel to Globalstar, met with John Grant, Special Advisor for Policy to Commissioner Deborah Taylor Tate. The purpose of this meeting was to discuss Globalstar's comments filed in IB Docket No. 02-364. A copy of the materials distributed during the meeting is attached to this letter.

Pursuant to Sections 1.49(f) and 1.1206(b) of the Commission's rules, a copy of this letter and its attachment has been filed electronically.

Respectfully Submitted,



Nathan Mitchler

cc (via email): John Grant
William F. Adler

Globalstar, Inc.

Presentation to FCC

April 27-28, 2006

Globalstar is a Success Story

- Globalstar services are critical to homeland security, emergency preparedness, national defense and economic growth in rural and remote areas and along coastal waters
- In the wake of the Florida hurricanes of 2004, and Hurricanes Katrina, Rita and Wilma in 2005, Globalstar's system remained operational and indispensable to recovery efforts
- Globalstar's system is a reliable global infrastructure component independent of, but interconnected with, terrestrial networks
- Globalstar is expanding U.S. and Northern Pacific coverage with a new Gateway in Alaska, opening this Summer
- Globalstar is launching eight ground spare satellites in early-2007
- Globalstar has started design and development work for its second generation constellation
- Globalstar has secured \$400 million of additional investment

Globalstar Emergency Response – Hurricane Katrina



- No other telecom service provider accomplished more in the days following Hurricane Katrina than Globalstar
- Globalstar's preparation in advance of the Hurricane:
 - Prepositioned phones in strategic locations to ensure rapid deployment
 - Utilized unique capability to re-allocate Gateway coverage footprints to increase capacity in Gulf area
 - Assigned network team to monitor usage of phones to ensure effective management of sudden surges of system use
- Globalstar's Immediate response in affected area:
 - Within 24 hours, increased network access capability by 60 %
 - Increased active spectrum assignment to handle increased volume
 - Reallocated Gateway coverage to maintain capacity to meet demand
 - Within 96 hours, deployed thousands of handsets and within one week deployed 12,000 voice and data terminals
 - Donated 100 phones each to governors of LA and MS
 - Doubled capacity for Globalstar calls to landlines
 - Maintained >95 % call completion in the face of 560 % increase in demand

The Record Before the FCC Does Not Support Any Spectrum Sharing

- Iridium has failed to provide any evidence that it requires more spectrum
 - The FCC cannot legally order sharing on the current record
- Globalstar's L-band spectrum assignment is already impaired
 - Protection of radioastronomy in-band
 - Protection of GPS and GLONASS in adjacent band
 - Sharing with Iridium in 1618.25-1621.35 MHz
- Sharing has a tangible adverse impact on Globalstar and its subscribers
 - Degraded service for Globalstar users in the shared portion of the band
 - Iridium signals come from both its satellites and its phones, reducing Globalstar's call success rate
 - Globalstar demonstrated this effect following Hurricane Katrina
 - Reduces Globalstar's ability to offer ATC services by encumbering channels needed for satellite services
 - Effectively prevents offering priority services to National Communications System (NCS) and other government agencies which must be assigned a unique channel
 - Impairs Globalstar's ability to offer aviation services which must be assigned to channels above 1616 MHz

The Record Before the FCC Does Not Support Any Spectrum Sharing (con't)

- Because Iridium cannot assign channels nationally or regionally, the adverse impact on Globalstar is global
 - After representing in the mid-1990s that it would control channels nationally or regionally, Iridium admitted in 2003 that it cannot
 - Iridium lacks authority in many countries around the world to operate below 1621.35 MHz
- Iridium's operation below 1618.25 MHz would have an additional adverse impact on radioastronomers
 - European radioastronomers are now complaining about increased interference from Iridium downlinks below 1621.35 MHz
 - European radioastronomers can take readings only four hours per day when Iridium operates above 1621.35 MHz
 - U.S. radioastronomers at Arrecibo, P.R. can take readings only eight hours a day when Iridium operates above 1621.35 MHz

Globalstar Service Link Frequencies

